

## UNITED STATES DISTRICT COURT

Northern District of New York

6th Judicial Division

JANE DOE, JOHN DOE

Plaintiffs

-against-

Case No.3:24-cv-274 (MAD/ML)

**[Proposed] Order**

JONATHAN REES aka GREG ELLIS  
aka JOHNATHAN REES aka JONNY REES  
aka JACOB LORENZO

Defendant

## PROPOSED ORDER

Upon consideration of the Motion for Subpoenas submitted by Jane Doe and John Doe, pro se, and after reviewing the supporting memorandum of law and relevant case law, it is hereby ordered as follows:

## 1. Justification for Issuance of Subpoenas

The Court finds that there is good cause for the issuance of subpoenas to GoDaddy.com llc, Domains by Proxy, Wordpress/Automattic Inc. NameCheap, and Bodis based on the following justifications:

a. **Relevance:** The information sought pertains directly to the claims in this civil action, including ownership and registration details of certain websites that are central to the

allegations.

b. **Necessity:** The requested documents are vital for establishing facts that support the Plaintiffs claims of retaliation, harassment and abuse to determine the amount of damages at an inquest hearing.

c. **Unavailability of Information:** The Plaintiffs have made reasonable efforts to obtain the information from other sources, including direct requests to the Defendant, which have proven ineffective.

d. **Pro Se Rights:** As a pro se litigant, the Plaintiffs are entitled to access necessary evidence to ensure a fair opportunity to present their case for default judgment and damages.

## 2. Issuance of Subpoenas

The Court hereby grants the motion and orders the issuance of subpoenas to GoDaddy.com llc, Domains by Proxy, Wordpress/Automattic Inc. NameCheap, and Bodis to produce the following documents:

a. Domain registration information for any and all records which identify the owner, operator, content creator or transferor of the domains with Jane Doe's full name ending in: lies.com, lies.info and files.com in their possession or control; such documents and records being business records made and kept in the ordinary course of its business and being relevant, material and necessary for the determination of ownership and/or control of the aforementioned web sites and this issue is in controversy within the proceedings; such aforesaid certification or authentication shall be by the company, or by an employee delegated for that purpose.

b. Hosting information for the websites in question and all records which identify the owner, operator, content creator or transferor of the domains ending in: lies.com, lies.info and files.com in their possession or control; such documents and records being business records made and kept in the ordinary course of its business and being relevant, material

and necessary for the determination of ownership and/or control of the aforementioned web sites and this issue is in controversy within the proceedings; such aforesaid certification or authentication shall be by the company, or by an employee delegated for that purpose.

**3. Compliance**

The entities are ordered to comply with the subpoenas and provide the requested documents by May 30th, 2025.

**IT IS** on this \_\_\_\_ day of \_\_\_\_\_, 2025,  
**ORDERED** that Plaintiffs Motion for Subpoenas  
is **GRANTED**.

BY THE COURT:

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District Court Judge